

Ballard Spahr LLP

1735 Market Street, 51st Floor
Philadelphia, PA 19103-7599
TEL 215.665.8500
FAX 215.864.8999
www.ballardspahr.com

May 12, 2025

Hon. Naomi Reice Buchwald
U.S. District Court, Southern District of New York

Re: Hantel v. National Debt Relief, LLC, No. 1:25-cv-01907-NRB (S.D.N.Y.)

Dear Judge Buchwald,

We write on behalf of Defendant National Debt Relief, LLC (“NDR”) and Plaintiff Harrison Hantel to advise you that the parties have reached a settlement in principle of Plaintiff’s claims in this action. The parties anticipate submitting a stipulation for dismissal with prejudice within the next sixty (60) days.

NDR’s deadline to answer or otherwise respond to Plaintiffs’ Complaint is May 12, 2025, and no initial pretrial conference has been scheduled thus far. In light of the parties’ settlement, and pursuant to Fed. R. Civ. P. 6(b) and Section 1(D) of your Individual Practices in Civil Cases, the parties request that all deadlines and conferences in this case be stayed by sixty (60) days to permit the parties an opportunity to finalize the terms of their settlement and submit their dismissal papers.

No party will be prejudiced by an extension of these matters. The parties have sought two extensions of NDR’s response deadline previously in this case, both of which the Court granted for good cause shown. The parties agree that this request is being brought in good faith and not for the purpose of causing undue delay.

Thank you in advance for your consideration of this request.

Sincerely,

s/ Gregory P. Szewczyk

BALLARD SPAHR LLP
Gregory Szewczyk

*Attorney for Defendant, National Debt
Relief LLC*

s/ Samuel R. Jackson

CARNEY BATES & PULLIAM, PLLC
Samuel R. Jackson
Joseph Henry Bates, III

Attorneys for Plaintiff